



ATTORNEYS AT LAW
A LAW CORPORATION

September 26, 2006

Kenneth J. Mansfield, Esq.

Via fax at 524-8293

Re: Engle v. Liberty Mutual

Dear Mr. Mansfield:

While we are waiting for your review and response to our letter to Dr. Lau earlier today regarding his deposition, we got an interesting call from Dr. Lau's office indicating that he wants \$1,000 paid to him or he will not comply with the subpoena, and he wants more money if his deposition goes more than an hour. Enclosed is his rate sheet that was faxed to us. In this case, where Dr. Lau is a factual witness, not a treating physician, nor an expert witness, and where he entered into a business arrangement with Liberty Mutual in order to supply it with a letter upon which it based its denials, we are having trouble seeing why we should pay him to comply with a subpoena. Please give me a call to discuss this as soon as you can. We may need to file a motion to compel his compliance with the subpoena.

Very truly yours,

SHIM & CHANG
Attorneys at Law

By

A handwritten signature in dark ink, appearing to read 'Roy K. S. Chang'.

ROY K. S. CHANG

HARVEY M. DEMETRAKOPOULOS

HMD:rrm

CLIFFORD K.H. LAU, M.D., F.A.C.S.

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(808) 524-2575

Telephone
(808) 522-9633

Legal Consultation:

| <u>Description</u> | <u>Amount</u> | |
|--|---------------|---|
| Client Examination | \$300.00 | |
| Court Room-from time I leave office to time I return | \$1000.00 | For 1 st hour or fraction or if canceled 5 days or less in advanced |
| | \$750.00 | For each additional hour or fraction of hour |
| In-house legal consult (Deposition) | \$250.00 | 1 st 15 minutes |
| | \$250.00 | 2 nd 15 minutes |
| | \$500.00 | add'l 30 minutes |
| | \$1000.00 | Total for 1 st hour . |
| | | 2 nd hour will be prorated. If canceled less than 5 working days in advance, charge will be for one hour. |
| Outer Island Courtroom | | Same as above courtroom charges, but the hours will include travel time for all working hours spent away from the office. |
| Phone consultations | | Same as In-house consultations |
| For depositions and court appearances | | There will be a \$1000.00 deposit required at the time of scheduling. |
| No show/late cancellations for IME/PPD | | \$350-\$500 will be charge for any IME/PPD CS/RS less than 5 working days. |

HP LaserJet 3200

HP LASERJET 3200

SEP-26-2006 3:30PM



Fax Activity Log

| Job | Date | Time | Type | Identification | Duration | Pages | Result |
|-----|-----------|------------|---------|-----------------|----------|-------|-----------------|
| 806 | 9/21/2006 | 12:26:25PM | Send | 5861369 | 1:17 | 7 | OK |
| 807 | 9/21/2006 | 12:27:47PM | Send | 5230759 | 1:24 | 7 | OK |
| 808 | 9/21/2006 | 12:39:51PM | Send | 18082441013 | 1:13 | 7 | OK |
| 809 | 9/21/2006 | 2:11:45PM | Send | 5452307 | 1:56 | 3 | OK |
| 810 | 9/21/2006 | 3:32:09PM | Send | 5861237 | 0:28 | 1 | OK |
| 811 | 9/21/2006 | 3:43:50PM | Send | 5377809 | 0:37 | 2 | OK |
| 812 | 9/21/2006 | 4:16:26PM | Receive | 8085379430 | 0:44 | 5 | OK |
| 813 | 9/22/2006 | 11:02:06AM | Send | 5229646 | 0:27 | 1 | OK |
| 814 | 9/22/2006 | 11:03:14AM | Receive | 8085217489 | 0:36 | 3 | OK |
| 815 | 9/22/2006 | 11:15:11AM | Send | 5218185 | 0:54 | 2 | OK |
| 816 | 9/22/2006 | 11:47:54AM | Receive | 808 5358444 | 0:24 | 2 | OK |
| 817 | 9/22/2006 | 12:20:38PM | Send | 9460520 | 0:28 | 1 | OK |
| 818 | 9/22/2006 | 1:01:50PM | Send | 9557925 | 0:27 | 1 | OK |
| 819 | 9/22/2006 | 1:03:29PM | Send | 9557925 | 0:25 | 1 | OK |
| 820 | 9/22/2006 | 3:43:43PM | Receive | 808 524 6690 | 0:20 | 1 | OK |
| 821 | 9/22/2006 | 4:46:09PM | Receive | 808 5380214 | 0:31 | 1 | OK |
| 822 | 9/23/2006 | 9:41:50AM | Send | 5992979 | 0:31 | 1 | OK |
| 823 | 9/25/2006 | 8:45:33AM | Receive | 8085938843 | 1:13 | 3 | OK |
| 824 | 9/25/2006 | 9:54:24AM | Send | 5381833 | 1:11 | 7 | OK |
| 825 | 9/25/2006 | 10:21:56AM | Receive | 8085226491 | 0:23 | 2 | OK |
| 826 | 9/25/2006 | 11:29:47AM | Send | 5381833 | 2:48 | 19 | OK |
| 827 | 9/25/2006 | 1:10:46PM | Receive | | 1:00 | 2 | OK |
| 828 | 9/25/2006 | 1:55:47PM | Send | 5992979 | 0:32 | 1 | OK |
| 829 | 9/25/2006 | 1:56:24PM | Send | 5219648 | 0:23 | 1 | OK |
| 830 | 9/25/2006 | 1:58:23PM | Receive | +1 808 521 7749 | 1:12 | 3 | OK |
| 831 | 9/25/2006 | 2:20:02PM | Send | 5219648 | 0:23 | 1 | OK |
| 832 | 9/25/2006 | 2:20:47PM | Send | 5475880 | 0:24 | 1 | OK |
| 833 | 9/25/2006 | 4:25:19PM | Receive | 808 527 7102 | 1:18 | 3 | OK |
| 834 | 9/26/2006 | 12:46:59AM | Receive | | 0:36 | 0 | No Fax Detected |
| 835 | 9/26/2006 | 7:52:33AM | Receive | Fax | 0:28 | 1 | OK |
| 836 | 9/26/2006 | 8:31:24AM | Receive | 8085226491 | 0:35 | 2 | OK |
| 837 | 9/26/2006 | 11:12:28AM | Send | 5229646 | 0:29 | 1 | OK |
| 838 | 9/26/2006 | 11:13:14AM | Send | 5248293 | 0:33 | 1 | OK |
| 839 | 9/26/2006 | 11:29:36AM | Receive | 808 955 7925 | 0:31 | 2 | OK |
| 840 | 9/26/2006 | 12:00:57PM | Send | 5277102 | 0:47 | 1 | OK |
| 841 | 9/26/2006 | 12:01:50PM | Send | 5246690 | 0:53 | 1 | OK |
| 842 | 9/26/2006 | 12:02:49PM | Send | 5281656 | 0:29 | 1 | OK |
| 843 | 9/26/2006 | 12:49:45PM | Send | 9557925 | 0:24 | 1 | OK |
| 844 | 9/26/2006 | 2:39:56PM | Receive | 8085368715 | 0:18 | 1 | OK |
| 845 | 9/26/2006 | 3:28:25PM | Send | 5248293 | 0:40 | 2 | OK ✓ |